

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

LESLIE BRIGGS, as next friend of T.W. )  
and B.S.; )  
EVAN WATSON, as next friend of C.R.; )  
and, )  
HENRY A. MEYER, III, as next friend )  
of A.M., for themselves and for others )  
similarly situated, )

Plaintiffs, )

v. )

Case No: 23-cv-81-GKF-JFJ

ALLIE FRIESEN, in her official capacity )  
as the Commissioner of the )  
Oklahoma Department of Mental Health )  
and Substance Abuse Services; and )  
DEBBIE MORAN, in her official )  
capacity as Executive Director of the )  
Oklahoma Forensic Center, )

Defendants. )

**ATTORNEY GENERAL’S RESPONSE TO SUPPLEMENT TO  
DEFENDANT’S OPPOSED MOTION TO SUBSTITUTE COUNSEL**

The Attorney General hereby submits his Response to the *Supplement to Defendant’s Opposed Motion to Substitute Counsel*, Doc. 110. In response thereof, the Attorney General states as follows:

The Governor lacks the “power to unilaterally prevent the Attorney General from appearing in [a] case. By virtue of his office, the Attorney General may act independently from the Governor, and represent such segment of the State’s interest not represented by the Governor.” *Cherokee Nation v. United States Dep’t of the Interior*, 2025 OK 4, ¶ 55.

Here, the Attorney General has consistently stated that he is simply representing and protecting the interests of the State of Oklahoma in this litigation. He has no intent to represent the personal interests of Defendants or the Governor. As such, despite the Attorney General’s public

questioning of Commissioner Friessen's honesty and integrity<sup>1</sup>, the Attorney General is still authorized to represent the interests of the State in this matter. Regardless of whether the Amended Consent Decree is approved by the Legislature, the Attorney General intends to continue representing the segment of the State's interest that expects the: (a) Oklahoma Department of Mental Health and Substance Abuse Services and Oklahoma Forensic Center to comply with Federal and State law, and (b) Commissioner of the Oklahoma Department of Mental Health and Substance Abuse Services to act in a competent and honest manner.

### CONCLUSION

The Attorney General requests that this Court deny the *Defendant's Opposed Motion to Substitute Counsel* [Doc. 76] consistent with this Response.

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<sup>1</sup> See Doc. 76-3.

Respectfully submitted,

/s Garry M. Gaskins, II  
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***Counsel for Defendants***

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of February, 2025, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to counsel of record who are ECF registrants.

s/ Garry M. Gaskins, II  
Garry M. Gaskins, II